

## UNITED STATES DISTRICT COURT

for the

District of Minnesota

UNITED STATES OF AMERICA

v.

KEITH DESHAWN CURTIS,  
a/k/a "Keymon"

Case No.

16-MJ-570(BRT)

FILED UNDER SEALPURSUANT TO 18 U.S.C. § 3509(d)(2) ANDLOCAL RULE 49.1(c)(1)(G)

## CRIMINAL COMPLAINT

I, the undersigned complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief. From on or about January 29, 2016 through on or about February 2, 2016, in the State and District of Minnesota and elsewhere, the defendant, Keith DeShawn Curtis, a/k/a Keymon,

in and affecting interstate commerce, knowingly recruited enticed, harbored, transported, provided, obtained, and maintained a person, namely Minor A, and benefited, financially or by receiving anything of value from participation in such a venture, knowing, or in reckless disregard of the fact, and having had a reasonable opportunity to observe Minor A, that Minor A had not attained the age of 14 years and would be caused to engage in a commercial sex act, and aided and abetted and conspired and attempted to do so, in violation of Title 18, United States Code, Sections 1591(a), 1591(b)(1) and 1594(c) (Sex Trafficking of a Minor);

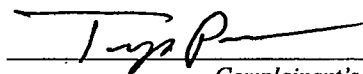
knowingly transported any individual who has not attained the age of 18 years in interstate commerce with intent that such individual engage in prostitution, or in any sexual activity for which any person can be charged with a criminal offense, and aided and abetted and attempted and conspired and attempted to commit such an offense, in violation of Title 18, United States Code, Sections 2423(a) and 2423(e) (Transportation of a Minor To Engage in Prostitution);

all in violation of Title 18, United States Code, Sections 1591(a), 1591(b)(1), 1594(c), 2423(a) and 2423(e).

I further state that I am a Special Agent and that this complaint is based on the following facts:

SEE ATTACHED AFFIDAVIT OF SPECIAL AGENT TONYA M. PRICE

Continued on the attached sheet and made a part hereof: ☒ Yes ☐ No



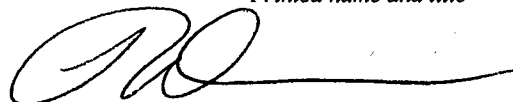
Complainant's signature

TONYA M. PRICE, Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: August 19, 2016



Judge's signature

City and State: St. Paul, Minnesota

The Honorable Becky Thorson, U.S. Magistrate Judge

Printed name and Title

SCANNED

AUG 22 2016

U.S. DISTRICT COURT ST PAUL